

**Application No.: 10/649,741**

**IN THE DRAWINGS**

Please replace the drawing sheets containing Figs. 1A and 1B, and Figs. 2A and 2B with the enclosed copies thereof.

## REMARKS

### I. Introduction

Applicants and Applicants' would like to thank Examiner Roman for the indication of allowable subject matter recited by claims 3-6. In response to the Office Action dated March 7, 2005, Applicants have amended Figs. 1B and 2B to correct reference numerals 12 and 14 so as to be consistent with description of the specification. Fig. 2A has been amended so that the location of the peripheral edge portion of the protrusion 11a conforms to that illustrated in Fig. 2B. Also, claim 3 has been rewritten into independent format, and claim 1 has been amended to incorporate the subject matter of claim 2. Claim 2 is canceled, without prejudice or disclaimer. New claim 13 is added. Support for all these amendments can be found, for example, in Fig. 1 and its corresponding section of the specification. No new matter has been added.

Furthermore, Applicants note that an IDS was filed on April 4, 2005, after the issuance of the pending Office Action. Accordingly, it is respectfully requested that the foregoing document be expressly considered during the prosecution of this application, and that the document be made of record therein. Applicants respectfully request that the PTO-1449 form submitted with the IDS be initialed and returned to the Applicants so as to confirm the IDS was considered.

For the reasons set forth below, Applicants respectfully submit that all pending claims are patentable over the cited prior art references.

### II. The Rejection Of The Claims Under 35 U.S.C. § 102

Claims 1-2 are rejected under 35 U.S.C. § 102(e) as being anticipated by USP No. 6,353,263 to Dotta. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1, which incorporates the subject matter of claim 2, recites that the second semiconductor chip has a peripheral edge portion that protrudes outwardly *beyond* the peripheral edge portion of the first adhesion layer.

In rejecting claim 1, the Examiner reads the conductive bonding agent 20 of Dotta as the claimed first adhesive layer, and the support portions 21 as the claimed peripheral edge portion. Also, in rejecting claim 2, the Examiner relies on Fig. 1 of Dotta as allegedly disclosing that the second semiconductor chip 2 protrudes outwardly beyond the support portions 21 of the conductive bonding agent 20.

However, Applicants respectfully disagree with such an interpretation, because the second semiconductor chip 2 of Dotta, at best, only protrudes outwardly beyond the bonding agent 7 and does *not* protrude beyond the conductive bonding agent 20 or the support portions 21. For example, referring to Fig. 1 of Dotta, it is clear that the outermost part of the second semiconductor chip 2 does *not* extend beyond the outermost part of the support portion 21.

This is further evidenced by the express disclosure of Dotta in which the “protruding portions of the second semiconductor chip 2 ... are supported from below by the support portions 21 formed by protruding resin of an anisotropic conductive bonding agent 20 (see, col. 9, lines 23-27).” That is, the structure of Dotta requires that the protruding resin of the anisotropic conductive bonding agent 20 and the support portions 21 protrude beyond the second semiconductor chip 2 so as to provide the necessary physical support for the second semiconductor chip. As such, if the second semiconductor chip 2 protrudes beyond the support portions 21 as perceived by the Examiner, the second semiconductor chip 2 of Dotta would necessarily suffer from the impact generated by the applied load and ultrasonic waves when the

wire bonding process is carried out, as expressly indicated in Dotta (see, col. 9, lines 27-31), thereby causing damage to the second semiconductor chip 2.

Accordingly, Applicants respectfully submit that Dotta does not disclose or suggest that the second semiconductor chip 2 has a peripheral edge portion that protrudes outwardly beyond the alleged peripheral edge portion 21 of the alleged first adhesion layer 20. This is further supported by the express principle of operation disclosed in Dotta; namely, "... *each* of the protruding portions of the second semiconductor chip 2 from the outer edges of the first semiconductor chip 1 *is supported* by the bonding agent protruding from the first semiconductor chip 1 (see, col. 9, lines 48-52)." Most importantly, as illustrated in Figs. 5, 7(b), 8(b) and 9(b) of Dotta, the alleged peripheral edge portion 21 clearly protrudes outwardly beyond the edge of the second semiconductor chip 2, and nothing in the prior art suggests otherwise.

Accordingly, as anticipation under 35 U.S.C. § 102 requires that each element of the claim in issue be found, either expressly described or under principles of inherency, in a single prior art reference, *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983), and at a minimum, Dotta fails to disclose or suggest the foregoing claim elements, it is clear that Dotta does not anticipate claim 1 or any of the claims dependent thereon.

**III. All Dependent Claims Are Allowable Because The Independent Claims From Which They Depend Are Allowable**

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as independent claim 1 is patentable for

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the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also in condition for allowance.

Furthermore, new claim 13 recites that the second adhesion layer has a film-like configuration. As the prior art appears silent with regard to the foregoing claimed feature, it is respectfully submitted that new claim 13 is also patentable over the cited prior art.

**IV. Conclusion**

Accordingly, it is urged that the application is in condition for allowance, an indication of which is respectfully solicited.

If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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